

Page 162

1 template for the product we were working on.
2 Q. You were provided those by the company?
3 A. Yes. There was a stack of pre-printed
4 forms.
5 Q. People just took them as they needed them?
6 A. Took them, depending on the product. If you
7 were working on product brief, you grabbed a product
8 brief template and then put the type on it.
9 Q. During this time period -- well, at any time
10 when you were performing graphic arts services from
11 '79 to 2002, were there others also providing
12 services in that department who were contractors and
13 not employees?
14 A. There were some contractors.
15 Q. Do you recall their names?
16 A. Maria Alphonso.
17 Q. Okay. Any other names?
18 A. Alex -- don't ask me to spell this,
19 Satnikof. He was Russian. Has a Russian name. I
20 have no idea how to spell it right now.
21 Q. Your understanding -- is there anybody else,
22 before I ask another question?
23 A. Well, Vytaus Dilba was hired back as a
24 contractor after he retired.

Page 163

1 Q. And Maria Alphonse, is that the name?
2 A. Alphonso.
3 Q. To your knowledge, when did she work as a
4 contractor in the graphic arts department?
5 A. She came in three days a week, and it was in
6 Billerica. Again, the late '90's.
7 Q. Did she at some point leave before you had
8 left?
9 A. She went out on maternity leave.
10 Q. Did she ever come back?
11 A. Yes and no.
12 Q. Okay. What do you mean by that?
13 A. Well, they hired Alex to take her place.
14 Then when she was ready to come back, she couldn't
15 come back.
16 Q. To your knowledge, she was a contractor?
17 A. To my knowledge she was.
18 Q. How do you know that?
19 A. I think she mentioned it one time.
20 Q. Do you know if she ever inquired as to
21 becoming an employee?
22 A. I wouldn't know that.
23 Q. How about Alex, when was he a contractor in
24 the department?

Page 164

1 A. When she went on maternity leave. I'm not
2 sure when that was.
3 Q. How long was he there?
4 A. He was let go on one of the last major
5 layoffs.
6 Q. Was that -- go ahead.
7 A. When the company had a major layoff, the
8 real big one. I'm not sure exactly what year it
9 was.
10 Q. Was that before you stopped working for the
11 company?
12 A. Yes.
13 Q. To your knowledge, did he ever become an
14 employee?
15 A. He didn't, no.
16 Q. Do you know any contractors in the graphic
17 arts department who did become employees?
18 A. No.
19 Q. Did all of the employees in the graphic arts
20 department work the same schedule?
21 A. No.
22 Q. Do you have a memory as to the different
23 schedules worked by different people at all?
24 A. Yes.

Page 165

1 Q. Could you describe how the scheduling worked
2 in the department?
3 A. Well, as I mentioned, Maria would come in
4 three days a week. And she would -- she left at
5 four. She had to pick up her children. And Alex
6 was working there five days a week, but then he
7 became the Web master for the company website. And
8 they allowed him to work at home with a provided
9 computer from Bull to work on the website.
10 Q. How about others who were working in the
11 graphic arts department, did they all work the same
12 schedule?
13 A. Yes.
14 Q. What was that schedule?
15 A. Eight to five.
16 Q. Did Bull ever provide you a computer for
17 home use?
18 A. No.
19 Q. Did you ever use the computer at home when
20 you bought the Mac, did you ever do Bull work on
21 that computer?
22 A. Not really.
23 Q. So when you took work home, is it your
24 testimony you didn't -- you never took work home

Page 166

1 after the time you got that computer?
 2 A. That's correct.
 3 Q. To your knowledge, did Mrs. Gavin ever do
 4 work for Bull on that computer?
 5 A. No, she did not.
 6 Q. What types of company functions did you
 7 attend while you were providing services to the
 8 graphic arts department?
 9 A. They had some off-site meetings. There was
 10 one in Chatham.
 11 Q. Chatham, Mass?
 12 A. Chatham, Mass. There was an overnight,
 13 there was probably three nights, if I remember
 14 right, providing graphic arts support for the
 15 communications center, making sure the slides for
 16 the meetings that the people were speaking were
 17 provided and updated or changed. Whatever was
 18 needed.
 19 Q. Did you attend that meeting?
 20 A. Not the meeting. I was behind the scenes.
 21 Q. But you were at the same location?
 22 A. I was there. I had a room provided for me.
 23 Q. Was that room paid for by the company?
 24 A. Yes.

Page 167

1 Q. Do you know if there were rooms for others
 2 that attended the meeting, for those that attended
 3 the meeting, was that also paid for by the company?
 4 A. Yes, it was.
 5 Q. Did you invoice the company for the time you
 6 spent at that meeting?
 7 A. Just as company time. As time against the
 8 PO, which was -- I don't believe it was specified
 9 just for that meeting. It was the -- it was just
 10 time for the company.
 11 Q. But you were compensated for the time?
 12 A. Yes.
 13 Q. And you did invoice for it, correct?
 14 A. Yes.
 15 Q. So the hotel room expenses were not -- you
 16 didn't charge them on your card?
 17 A. No.
 18 Q. Any other meetings or functions you can
 19 recall attending?
 20 A. There was one in Tyngsboro. It was an
 21 overnight. I'm not sure what the meeting was
 22 called, but it was about -- it was friends of the
 23 company or clients of the company trying to drum up
 24 business, and they had private meetings with these

Page 168

1 companies. And I was there as support help.
 2 Q. The Chatham meeting you talked about, was
 3 anyone else from graphic arts there?
 4 A. Just people superior to me.
 5 Q. So you were the only actual --
 6 A. I was the only graphic artist that went,
 7 yes.
 8 Q. I was going to ask if you were the only
 9 person actually working there. That's not the way
 10 I'll phrase it. You were the only graphic artist
 11 there. Thank you for phrasing it better than I
 12 would have. The Tyngsboro meeting, were you the
 13 only graphic artist there?
 14 A. No, I wasn't. That was a huge meeting.
 15 Q. Okay. So who else was there, if you recall?
 16 A. Ted Lavash and one other graphic artist, I
 17 think. I can't remember which one, though.
 18 Q. Do you know if it was an employee or
 19 contractor?
 20 A. It was an employee.
 21 Q. But you don't recall who it was?
 22 A. I can't remember who it was.
 23 Q. Any other meetings or functions you can
 24 recall?

Page 169

1 A. We had various meetings here and there, but
 2 those were the only ones overnight.
 3 Q. You testified that when you first came back
 4 in 1979 that you would get work by taking work off
 5 the top of the pile, correct?
 6 A. Correct.
 7 Q. Did that method of distributing work change?
 8 A. Yes.
 9 Q. How did that change?
 10 A. They stopped doing tech manuals. There
 11 wasn't the repetitious work anymore of that kind of
 12 work.
 13 Q. How after that did work get assigned?
 14 A. It would still be assigned.
 15 Q. Who would assign it?
 16 A. At the time -- the person who was in charge
 17 of me at the time would assign the work.
 18 Q. I think your testimony was that you were, if
 19 not -- well, you were the most -- is it your
 20 testimony you were the most proficient on the
 21 computer once the Mac came into the department?
 22 A. I believe so, yes.
 23 Q. Would your assignments reflect your
 24 proficiency on the computer?

43 (Pages 166 to 169)